

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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| GLENN BURTON, JR.,<br><br>Plaintiff,<br><br>v.<br><br>AMERICAN CYANAMID CO., et al.,<br><br>Defendants. | Case No. 07-CV-0303-LA |
| RAVON OWENS,<br><br>Plaintiff,<br><br>v.<br><br>AMERICAN CYANAMID CO., et al.,<br><br>Defendants.       | Case No. 07-CV-0441-LA |
| CESAR SIFUENTES,<br><br>Plaintiff,<br><br>v.<br><br>AMERICAN CYANAMID CO., et al.,<br><br>Defendants.   | Case No. 10-CV-0075-LA |

**DECLARATION OF CHARLES H. MOELLENBERG, JR.**

I, Charles H. Moellenberg, Jr., declare:

1. I am over 21 years of age, and I have personal knowledge of all of the matters and facts set forth in this Declaration.
2. I am Of Counsel with the law firm of Jones Day, counsel for The Sherwin-Williams Company in these matters. I am licensed to practice law in the Commonwealth of Pennsylvania and State of Ohio, and I am admitted to practice in the United States District Court for the Eastern District of Wisconsin. I submit this Declaration to the Court in support of

Defendant The Sherwin-Williams Company's Reply in Support of Its Motion for Reconsideration of March 26, 2019 Oral Decision on Motions #1162, #1150, and #1164 or, in the Alternative, Motion to Continue the Trial and Re-Open Fact and Expert Discovery.

3. Attached as Exhibit A is a true and correct copy of the pertinent excerpt of the Expert Disclosure of Dr. William Banner, Jr., for *Burton v. American Cyanamid*, No. 2:07-cv-00303 (E.D. Wis.) dated March 20, 2017. The entire report has not been included, as it contains confidential medical information that would necessitate filing under seal, but is irrelevant to the issues raised in Sherwin-Williams' reply brief in support of its motion to reconsider.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the statements in this Declaration are true and correct.

Dated: April 16, 2019

/s/ Charles H. Moellenberg, Jr.

Charles H. Moellenberg, Jr.